



MARCUS NEIMAN RASHBAUM & PINEIRO LLP

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November 23, 2022

Via CM/ECF

The Honorable Victor Marrero
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St., Courtroom 15B
New York, NY 10007-1312

USDC SDNY
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RE: *Ridinger, et al. v. Stone, et al.*, Docket No. 22-CV-09082-VM

Dear Judge Marrero,

Pursuant to Local Rule 7.1(d) and Rule I(F) of Your Honor's Individual Practices (the "Individual Practices"), Plaintiffs Loren M. Ridinger, individually and on behalf of the Estate of James Ridinger, and Milagro Yacht Charters, LLC (together, "Plaintiffs") file this letter motion, which is unopposed, and request a seven (7) day extension of time, up to and including Friday, December 2, 2022, to respond to the letter filed by Defendants Ralph K. Stone, Rachel L. Gould, and Meister Seelig & Fein LLP (together, "Defendants") on November 18, 2022 [D.E. 15], pursuant to Rule II(B) of the Individual Practices.

On October 24, 2022, Plaintiffs initiated this action by filing a three-count Complaint against Defendants for legal malpractice (Count I), breach of fiduciary duty (Count II), and vicarious liability (Count III). [D.E. 1]. Pursuant to Rule II(B) of the Individual Practices, on November 18, 2022, Defendants filed a letter to Plaintiffs, copying the Court, setting forth what they contend are grounds for dismissal of the Complaint. [D.E. 15]. Rule II(B) provides that, "The plaintiff shall respond by similar letter within seven calendar days, with a copy to the Court, indicating the extent, if any, to which plaintiff concurs with defendant's objections and the amendments, if any, to be made to the complaint to address them, or else stating the reasons and controlling authority that support the pleadings as filed."

Plaintiffs' deadline to respond to Defendants' letter falls on November 25, 2022. Given the impact of the intervening Thanksgiving Holiday on the schedules of Plaintiffs and their counsel, however, Plaintiffs need additional time to consult with counsel about the arguments raised in Defendants' letter and prepare a response to same. As such, Plaintiffs request an additional seven (7) days, up to and including December 2, 2022, to respond to Defendants' letter.

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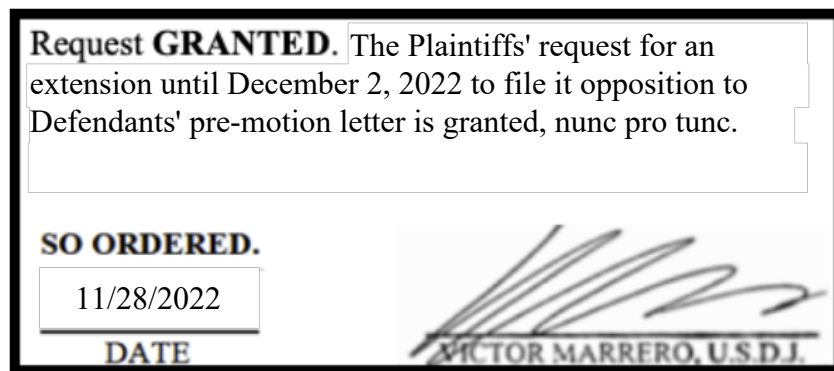
Plaintiffs have conferred with Defendants' counsel, who has no objection to this request. Plaintiffs further state that they have not previously made any extension requests. Plaintiffs therefore request that the Court grant this request and enter an order granting Plaintiffs an additional seven (7) days, up to and including December 2, 2022, to respond to Defendants' letter.

Respectfully submitted,

/s/ Jeffrey A. Neiman

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Copies to counsel of record via CM/ECF



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